

1 January 2016

Communication Policy

For

Parami Energy Group of Companies

PARAMI ENERGY GROUP OF COMPANIES promotes discourse that is professional, honest, and with integrity. This **Communication Policy** aims to influence, guide, and regulate the various modes of communication used by employees in a company.

Introduction:

This policy measure establishes the parameters by which Parami Energy employees should communicate when using (1) news media, (2) social media, and (3) interpersonal communication.

Employees should exercise fairness, proper courtesy, consideration and sensitivity in dealing with customers, colleagues and stakeholders

Employees must not disclose any confidential or private information obtained through her/his employment to third parties, and should share confidential or private information *only* with the Company management and other employees on a need-to-know basis.

This policy is concurrently aligned with the Company's Code of Conduct policy of which some overlaps will be seen. This policy applies to all employees, officers and directors of the Company and its related subsidiaries or group of companies.

1. Communication Categories:

- a. **(1) News Media:** The Company is committed to open and honest forms of communication, but also is committed to protecting sensitive information and the corporate image. Employees must provide information that is truthful and consistent with the policies regarding quality and confidentiality when providing information to the media or to the public. Company activities will be published through our website and media agencies, both in Myanmar and abroad.
 - i. It is the usual responsibility of the senior management to discuss the company's progress and challenges.
 - ii. The Company's relationships with the media are conducted exclusively by the Chief Executive Officer (CEO) or as delegated by the CEO.
 - iii. Employees must not comment on any aspect of the Company or publicly represent their own opinion as the Company's opinion to the media. If an employee receives an inquiry from the media, they must immediately report it to the Chief Executive Officer (CEO).

1. There should be no employee that could represent Parami in their capacity (e.g. There should be a chain of command in communication).
 2. Employees will seek permission before discussing Parami affairs with the press unless it has already been established through media channels.
 3. Employees will seek permission before discussing current, potential, and future Parami business affairs
 - iv. It is unacceptable for employees to disclose dishonorable content, such as racial, cultural, ethnic, sexual, religious slurs through new media outlets.
- b. **(2) Social Media:** Parami's senior management understands that social media is now becoming one of the key communication channels for people. Having said that, this should not be abused. While personal opinions do matter, there is a need for professional guidance when it comes to company plans.
- i. Forms of social media include: Facebook, Twitter, blogs, Viber, Line, etc.
 - ii. Employees will seek permission before posing Parami affairs on social media, unless it has already been established through media channels.
 - iii. Employees will seek permission before posting Parami's current, potential, and future business plans, unless it has already been established through media channels.
 - iv. It is unacceptable for employees to disclose dishonorable content, such as racial, cultural, ethnic, sexual, religious slurs through social media outlets.
 - v. This is in no way to say that we are against personal freedom of speech. These guidelines are meant to preserve the company's professional interest
- c. **(3) Interpersonal communication:** At Parami we encourage a respectful and cordial work environment. Employees will, at all times, be sensitive to the different social groups of our company and country.
- i. Employees must be able to work in a workplace that is free from discrimination, physical, sexual, psychological, or verbal harassment or abuse, misuse of substances, and unsafe conditions
 - ii. There should not be any belittling of any person or group at any time. There is zero tolerance for the discrimination of a person or group based on her/his: ethnicity, religion, culture, gender, sexuality, or political affiliation.
 - iii. There is zero tolerance for any kind of harassment (verbal or sexual). Any kind of communication (verbal, non-verbal such as physical touching or suggestive motions, or written in any form) that can be exploitative in any

way, is entirely prohibited. Those who experience such kind of communication and/or interaction are highly encouraged to report such an incident by contacting any of the 6 Parami counselors, if the employee does not feel comfortable bringing this to the attention of head management. Please refer to our Grievance Policy for more information.

- d. All employees commit to make for a positive work environment. This includes communicating in a respectful, cordial, and positive manner.
- e. In the event that a Parami employee has breached this policy, she/he will be referred to the compliance officer. Parami's current compliance officer is Mr. Myint Win, legal advisor. He may be reached at mwin@parami.com
- f. In the event that a Parami employee feels any type of discrimination, she/he can seek council with compliance officer or a neutral counselor.

2. Communication Tools:

- a. Parami shall publish all relevant affairs for public viewing. This information can be found on the Parami website, Parami Facebook page, and through new media articles. Senior management is responsible for the diffusion of information through these medium.
- b. Relevant and important events, such as speeches, training sessions, and conferences will be published for public viewing on the Parami website and Facebook page.
- c. **Internal Communication:** Parami will submit relevant information for its employees through news bulletins and internal emails.
 - i. Employees must use secure shred bins for disposing of documents with confidential or private information.
 - ii. Employees must not transmit or share confidential or private information to third parties without consulting the line manager and Document Control Department

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